JTH Tax, Inc. v. Reed Doc. 2

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION

JTH TAX, INC. d/b/a LIBERTY TAX SERVICE,

Plaintiff,

Civil No. 2:07cv169

v.

JEROME REED,

Defendant.

Declaration of Jan Gundran

Pursuant to 28 U.S.C. § 1746, I, Jan Gundran, submit this declaration in support of JTH Tax, Inc.'s ("Liberty") claim against Jerome Reed ("Reed"). I declare under penalty of perjury that the following statements are true and correct:

1. I am over the age of eighteen (18) years and am fully competent to testify to the matter stated in this declaration. This declaration is based upon my personal knowledge, Liberty's corporate and business records, and information available form Liberty's employees and agents.

2. I am a Staff Accountant for JTH Tax, Inc. d/b/a Liberty Tax Service ["Liberty"] and have held that position since August 2003.

3. On the date that Liberty Tax terminated Reed, June 27, 2006, he owed to Liberty Tax $10,626.80, of which $10,469.75 was more than 30 days past due. See attached document.

4. The attached is an accurate Debt Balance spreadsheet as of June 29, 2006. These spreadsheets are used to show the status of accounts and notes receivable as of the date indicated on such spreadsheet for Jerome Reed.

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5. At no time has Reed paid any portion of the $10,626.80 of delinquent monies owed to Liberty as shown on the attached.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 11th day of April 2007.

Jan Gundran